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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

MARY JANE WHALEN, MONICA
MEILOAICA, and CHASOM BROWN,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

EPIQ SYSTEMS, INC., ANGEION GROUP
LLC, JND LEGAL ADMINISTRATION,
HUNTINGTON NATIONAL BANK,
WESTERN ALLIANCE BANK, and DOES 1-
20,

Defendants.

Case No. 3:25-cv-04522-JSC

**JOINT STIPULATION AND [PROPOSED]
ORDER TO STAY OR EXTEND TIME TO
ANSWER, MOVE, OR OTHERWISE
RESPOND TO COMPLAINT, CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE, AND EXTEND RELATED
DEADLINES**

The Hon. Jacqueline Scott Corley
Courtroom 8

Pursuant to Civil Local Rules 6-1 and 6-2, Plaintiffs Mary Jane Whalen, Monica Meiloaica, and Chasom Brown, individually and on behalf of all others similarly situated (“Plaintiffs”), and Defendants Epiq Systems, Inc. (“Epiq”), Angeion Group LLC (“Angeion”), JND Legal Administration (“JND”), The Huntington National Bank (“Huntington”), and Western Alliance Bank (“Western Alliance”) (“Defendants”) (together with Plaintiffs, the “Parties”), stipulate as follows:

WHEREAS this case is one of five putative class actions currently pending in four different federal courts involving substantially similar allegations, claims, and defendants, *see* (1) *Whalen v. Epiq Systems Inc., et al.*, No. 3:25-cv-4499 (S.D.N.Y.); (2) *Tejon v. Epiq Systems, Inc., et al.*, No. 1:25-cv-22453 (S.D. Fla.); (3) *Rieger v. Epiq Systems, Inc., et al.*, No. 3:25-cv-04793 (N.D. Cal.); and (4) *Baker v. Epiq Systems, Inc., et al.*, No. 2:25-cv-02079 (E.D. Pa.) (together with the above-captioned case, the “Related Actions”);

WHEREAS, on August 13, 2025, Plaintiffs Tyler Baker and Lauren Wolf, Plaintiffs in the Eastern District of Pennsylvania action, *Baker v. Epiq Systems, Inc., et al.*, No. 2:25-cv-02079 (the “*Baker* Plaintiffs”), filed a motion before the Judicial Panel on Multidistrict Litigation (“JPML”) pursuant to 28 U.S.C. § 1407 and Rule 7.2 of the Rules of Procedure of the JPML, to transfer and centralize the Related Actions to the U.S. District Court for the Eastern District of Pennsylvania or, alternatively, to the U.S. District Court for the Southern District of New York for consolidated or coordinated pretrial proceedings (“JPML Motion”);

WHEREAS the JPML may decide to consolidate this case with the Related Actions, either in this Court or another district court;

WHEREAS, if the cases are transferred to another district, this Court will not need to rule on any motion(s) to dismiss and, if the cases are transferred to this Court, Plaintiffs may file an amended complaint;

WHEREAS judicial economy is served by staying matters and not requiring the defendants to answer, move to dismiss, or otherwise respond to the Complaint pending the resolution of a motion before the JPML, *see Johnson v. Starbucks Corp.*, 2018 WL 3159689, at *1, *3 (N.D. Cal. June 28, 2018) (explaining that, “[a]lthough a case is not automatically stayed upon the filing of a motion for transfer and coordination before the JPML, a district court has discretion to stay the case

through exercise of its inherent power,” and finding that “a brief stay will serve judicial economy”); *A.H.M. v. Uber Techs., Inc.*, 2023 WL 6199179, at *1, *3 (N.D. Cal. Sept. 22, 2023) (Corley, J.) (holding that “all the relevant facts strongly favor a stay of proceedings pending the JPML decision”);

WHEREAS, absent a stay, Defendants’ deadline to answer, move to dismiss, or otherwise respond to the operative Complaint is September 5, 2025 (Dkt. No. 34);

WHEREAS the deadlines to file an ADR Certification and to complete the Rule 26(f) Meet and Confer are September 3, 2025 (Dkt. No. 34);

WHEREAS the deadlines for Initial Disclosures and for a Joint Case Management Statement are September 17, 2025 (Dkt. No. 34);

WHEREAS the Initial Case Management Conference is scheduled for September 24, 2025 at 2:00 p.m. (Dkt. No. 34);

WHEREAS discovery has not yet begun;

WHEREAS the instant Stipulation is the third stipulated extension to extend the deadline to respond to the Complaint (and the second as to all Defendants collectively for the time to respond to the Complaint), and the second stipulated extension to continue the Initial Case Management Conference and related deadlines (Dkt. Nos. 25 (stipulation extending Western Alliance’s deadline to respond to the Complaint until no earlier than September 5, 2025), 32 (stipulation extending time for other Defendants to respond to the Complaint until September 5, 2025, continuing the Initial Case Management Conference, and extending time for related deadlines as to the Parties), 34 (order granting Dkt. No. 32 stipulation));

WHEREAS Plaintiffs and Defendants have conferred and agree that judicial economy and the interests of justice would be served by staying the above-captioned case pending the JPML’s decision on Plaintiffs’ pending JPML Motion;

NOW, THEREFORE, it is hereby STIPULATED AND AGREED that:

1. All outstanding deadlines in the above-captioned case, including Defendants’ deadline to answer, move to dismiss, or otherwise respond to the Complaint, are stayed pending the JPML’s decision on the *Baker* Plaintiffs’ JPML Motion.

2. If the JPML grants the *Baker* Plaintiffs' JPML Motion and the matter is consolidated before this Court, Defendants will have 60 days after the filing of a consolidated complaint to answer or otherwise respond to the consolidated complaint.

3. If the JPML denies the *Baker* Plaintiffs' JPML Motion, Defendants will have 45 days from the date of such denial order to respond to the Complaint.

4. The Initial Case Management Conference scheduled for September 24, 2025 is vacated and continued.

5. If the matter is consolidated before this Court or if the JPML denies the *Baker* Plaintiffs' JPML Motion, within 14 days thereafter, the Parties shall jointly propose new deadlines to file an ADR Certification and provide Initial Disclosures, and will propose a new date for the Initial Case Management Conference, which will trigger new deadlines to complete the Rule 26(f) Meet and Confer and file a Joint Case Management Conference Statement.

DATED: August 21, 2025

Respectfully submitted,

/s/ Adam R. Shaw

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*Counsel for Defendant The Huntington
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Attestation Pursuant to Local Rule 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: August 21, 2025

/s/ Brendan P. Cullen

Brendan P. Cullen